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April 4, 2013

Via ECF

Hon. Steven C. Mannion, U.S.M.J.
United States District Court
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07101

Re: *Hoffman v. Time Warner Cable, Inc.*
Civil Action No. 12-cv-978 (ES)(SCM)

Dear Judge Mannion:

This firm represents Plaintiff, Harold M. Hoffman, in the referenced action.

I write to respectfully request an additional 90-day extension of the discovery order entered by Judge Waldor on December 12, 2012 (*ECF No. 31*). Defendant, Time Warner Cable, Inc., joins Plaintiff's request.

This renewed request is premised on the parties' continued goal of allowing Judge Debevoise to issue a decision on Time Warner Cable's pending Rule 12(b)(6) motion, prior to expending both sides' resources on further discovery. The transfer of the motion from Judge Salas to Judge Debevoise last October understandably delayed the motion's disposition. The parties respectfully seek to synchronize their discovery efforts with the Court's ruling on the merits of the underlying claims.

If granted, this application would extend the conclusion of both parties' class discovery for 90 days from the existing April 10, 2013 deadline, and would replace the scheduled April 8, 2013 conference call with the Court for one on a new date to be determined by Your Honor.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'PC' followed by a stylized flourish.

PHILIP C. CHRONAKIS

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cc: Jonathan D. Thier, Esq.
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